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Filed 06/04/25

Page 1 of 1

U.S. Department of Justice

United States Attorney Southern District of New York

NEWO ENDORSED

**BY ECF** 

The Honorable Richard M. Berman United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Julio Cesar Hernandez,

The Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278

June 4, 2025

Affice trans Gran & d.-
to We line lay Sept. 3, 2025

SO ORDERED:
Date:

Dear Judge Berman:

The parties jointly submit this letter respectfully to request an adjournment of the status conference in this case, currently scheduled for June 10, 2025, for approximately 90 days or as convenient for the Court, and to request the exclusion of time between June 10, 2025 and June 30, 2025, the date that the defendant's motions are due, pursuant to 18 U.S.C. § 3161(h)(7)(A).

Per the Court's order of May 6, 2025, the defense's motions are due on June 30, 2025, with the Government's responses due July 21, 2025, and the defense reply due on August 4, 2025. Dkt. 13. At this time, the parties do not have any matters to raise with the Court. As such, the parties respectfully request an adjournment of the status conference until the defense motions have been fully briefed.

The Government further submits that the ends of justice served by excluding time between June 10, 2025 and June 30, 2025 outweigh the interest of the public and the defendant in a speedy trial, because that time will permit the defense to consider and draft any motions it wishes to make, and will permit the parties to discuss a potential pre-trial resolution of this matter. Defense counsel consents to this request.

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Respectfully submitted,

JAY CLAYTON United States Attorney

By:

/s/ Rebecca R. Delfiner
Rebecca R. Delfiner
Assistant United States Attorney
(212) 637-2427

cc: All counsel of record (via ECF)